

# **EXHIBIT G**

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY  
CASE NO. 2:19-MD-02904-MCA-MAH

IN RE: AMERICAN MEDICAL : VIDEOTAPED  
COLLECTION AGENCY, INC.,  
CUSTOMER DATA SECURITY : DEPOSITION OF:  
BREACH LITIGATION

: DAVID ULRICH

This Document Relates To:

All Actions : (VIA ZOOM)

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TRANSCRIPT of the stenographic notes of the proceedings in the above-entitled matter, as taken remotely by and before SEVA FLICSTEIN, Certified Court Reporter (New Jersey License No. 30XI000141300, California Certificate No. CSR 8727), Registered Merit Reporter, Certified Realtime Reporter, witness located in Yorktown Heights, New York, on Tuesday, March 21, 2023, commencing at 9:04 in the forenoon.

A P P E A R A N C E S:

CARELLA BYRNE CECCHI  
OLSTEIN BRODY & AGNELLO PC  
BY: LINDSEY H. TAYLOR, ESQ.  
5 Becker Farm Road, 2nd Floor  
Roseland, New Jersey 07068  
ltaylor@carellabyrne.com  
Attorneys for Plaintiffs

LITE DEPALMA GREENBERG & AFANADOR, LLC  
BY: CATHERINE B. DERENZE, ESQ.  
570 Broad Street, Suite 1201  
Newark, NJ 07102  
cderenze@litedepalma.com  
Attorneys for Plaintiffs

ALSTON & BIRD, LLP  
BY: TROY STRAM, ESQ.  
One Atlantic Center  
1201 West Peachtree Street  
Suite 4900  
Atlanta, Georgia 30309-3424  
troy.stram@alston.com  
Attorneys for Optum360

SIDLEY AUSTIN, LLP  
BY: MARLOW SVATEK, ESQ.  
HEATHER SULTANIAN, ESQ.  
One South Dearborn  
Chicago, Illinois 60603  
msvatek@sidley.com  
hsultanian@sidley.com  
Attorneys for Quest Diagnostics

A P P E A R A N C E S (Cont'd.):

HOGAN LOVELLS US, LLP  
BY: ALICIA J. PALLER, ESQ.  
21 Columbia Square  
555 13th Street NW  
Washington, DC 20004  
alicia.paller@hoganlovells.com  
Attorneys for Defendant Laboratory  
Corporation of America Holdings and  
Laboratory Corporation of America  
(collectively, LabCorp)

LEWIS BRISBOIS BISGAARD & SMITH, LLP  
BY: BRADLEY BARTOLOMEO, ESQ.  
ABAIGEAL FRANSON  
77 Water Street  
Suite 2100  
New York, New York 10005  
Bradley.Bartolomeo@lewisbrisbois.com  
Abaigeal.Franson@lewisbrisbois.com  
Attorneys for Sonic

GORDON REES SCULLY MANSUKHANI LLP  
BY: ANDREW M. SCHWARTZ, ESQ.  
1717 Arch Street, Suite 610  
Philadelphia, Pennsylvania 19103  
(215) 717-4023  
amschwartz@grsm.com  
Attorneys for the Witness and  
The CCS Companies

1 A P P E A R A N C E S (Cont'd.):  
2  
3

KRAFT LAW FIRM

4 BY: MICHAEL KRAFT, ESQ.

30 Coach Lane

5 Westwood, Massachusetts 02090

michael@kraftlawfirm.com

6 Attorneys for the Witness and

The CCS Companies  
7  
8  
9  
10

A L S O P R E S E N T:  
11

12 JOE RAGUSO, Legal Video Specialist

13 GREGG HOLDERMAN, Technical Concierge  
14  
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1 noted on the stenographic record.

2 D A V I D U L R I C H,

3 residing at 757 Wildwood Court,

4 Yorktown Heights, New York 10598, having

5 been duly sworn by the Certified Court

6 Reporter, testifies as follows:

7 -----

8 EXAMINATION

9 -----

10 BY MR. STRAM:

11 Q. Good morning, Mr. Ulrich.

12 A. Good morning.

13 Q. My name is Troy Stram. I  
14 represent Optum360 in this matter. Thank you  
15 for taking some time to speak with us this  
16 morning.

17 Have you ever been deposed before,  
18 Mr. Ulrich?

19 A. No.

20 Q. So I will go over just a few  
21 ground rules before we jump in, mainly to make  
22 sure things run smoothly today.

23 So the first is that our court  
24 reporter is going to be taking down everything  
25 for the stenographic record, which means that

1 correct.

2 Q. And so if those codes were  
3 received as an alphanumeric code with no  
4 description added, someone viewing that code  
5 would need to look up what each individual code  
6 meant on a code-by-code basis to understand what  
7 it was saying; correct?

8 A. Yes.

9 MR. TAYLOR: Object to form.

10 Q. And you had the ability to log in  
11 to Champ; correct?

12 A. Yes.

13 Q. How frequently would you access  
14 the Champ database?

15 A. Very infrequently. Because I  
16 didn't migrate well over to it, so I was mainly  
17 a mainframe user.

18 Q. When you did log in to the Champ  
19 database and pull up a patient profile, what  
20 information did you see?

21 A. For myself, I would see the  
22 patient name, I could see the address, I could  
23 see the balance owed, I could see if it was paid  
24 or not. Again, I used it for very basic  
25 information.

1 Q. Medical information would not come  
2 up on that initial page with the name, address,  
3 balance owed; correct?

4 MR. TAYLOR: Object to form. You  
5 can answer.

6 A. Say that again.

7 Q. Medical information would not come  
8 up on the page that would be initially viewable  
9 on your screen along with the name, address,  
10 balance owed; correct?

11 A. Correct.

12 Q. You would have to navigate to a  
13 separate page in order to be able to view that  
14 type of information?

15 A. Correct.

16 Q. Throughout your time at AMCA, did  
17 the company always hold itself out to clients as  
18 being fully compliant with applicable security  
19 standards and regulations?

20 A. Yes. Based on my understanding,  
21 yes.

22 Q. And prior to the data breach, was  
23 it your understanding that AMCA was, in fact,  
24 fully compliant with all applicable security  
25 standards and regulations?



1 says, "Some examples include preparing HCFA  
2 requests."

3 Do you see that?

4 A. Yes.

5 Q. What is a HCFA request?

6 A. I think back at that time, if a  
7 patient requested proof of the debt, we would be  
8 able to print very basic HCFA form with the  
9 information for the patient.

10 Q. Do you know, is that referring to  
11 the HCFA 1500 or now known as the CMS 1500  
12 form?

13 A. Yes.

14 Q. And is that a form used to file a  
15 health insurance claim?

16 A. Yes.

17 Q. So when AMCA said to prepare HCFA  
18 requests, what did that entail?

19 A. Again, at that time, we had HCFA  
20 forms that, again, if the patient requested  
21 proof of the debt, we were able to print minimal  
22 information on that form to send to the patient.

23 Q. So AMCA would complete the HCFA  
24 form and then provide the completed form to the  
25 patient. Is that right?

1           A.     Not a completed form, but a form  
2     with some basic information, yes.

3           Q.     But HCFA requests were part of the  
4     collection services that AMCA was providing to  
5     Quest; correct?

6           A.     Yes.

7           Q.     And AMCA was preparing HCFA  
8     requests for Quest patients in 2014 when it  
9     submitted these RFP responses; correct?

10          A.     Yes.

11          Q.     In that same box, the 2.2.2 box,  
12     it goes on to mention the Medicare program.

13                 What's the Medicare program?

14          A.     I don't remember.

15          Q.     Do you recall whether AMCA had  
16     different practices or policies for interacting  
17     with Quest's Medicare patients?

18          A.     You know, I don't remember, but I  
19     think we did have a separate client code for  
20     Medicare accounts. But I really don't remember.

21          Q.     Okay. That's fair. It was a long  
22     time ago.

23                 So this description of AMCA's  
24     distinguishing services in this box also  
25     mentions reducing patient complaints a few